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7 Attorney for Harold David Sobel

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 HAROLD DAVID SOBEL,
15 Defendant.
16

Case No. 2:21-cr-00235-APG-EJY

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Mina Chang, Assistant United States Attorney, and
19 Gustav W. Eyler, Director, and Meredith B. Healy and Wei Xiang, Trial Attorneys,
20 U.S. Department of Justice, Consumer Protection Branch, counsel for the United States of
21 America, and Rene L. Valladares, Federal Public Defender, and Nisha Brooks-Whittington,
22 Assistant Federal Public Defender, counsel for Harold David Sobel., that the previously ordered
23 deadline for filing of pretrial motions be vacated and that the parties herein shall have to and
24 including April 25, 2022, within which to file the pretrial motions currently due
25 April 11, 2022.
26

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including May 9, 2022, to file any and all responsive pleadings, currently due
3 April 25, 2022.

4 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
5 shall have to and including May 16, 2022, to file any and all replies to dispositive motions,
6 currently due May 2, 2022.

7 The Stipulation is entered into for the following reasons:

8 1. Counsel for the defendant needs additional time to investigate, research, and file
9 pretrial motions.

10 2. The defendant is incarcerated and does not object to the continuance.

11 3. The parties agree to the continuance.

12 4. The additional time requested herein is not sought for purposes of delay, but
13 merely to allow counsel for defendant sufficient time within which to research and file pretrial
14 motions.

15 5. Additionally, denial of this request for continuance could result in a miscarriage
16 of justice.

17 This is the second stipulation to continue filed herein.

18 DATED this 6th day of April 2022.

19 RENE L. VALLADARES
20 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

21 */s/ Nisha Brooks-Whittington*
22 By _____

/s/ Mina Chang
By _____

23 NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

MINA CHANG
Assistant United States Attorney

1 GUSTAV W. EYLER
2 Director
3 U.S. Department of Justice

4 */s/ Meredith Burns Healy*
5 By _____

6 MEREDITH BURNS HEALY
7 Trial Attorney

8 */s/ Wei Xiang*
9 By _____

10 WEI XIANG
11 Trial Attorney
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 HAROLD DAVID SOBEL,

7 Defendant.

Case No. 2:21-cr-00235-APG-EJY

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

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10 **FINDINGS OF FACT, CONCLUSIONS OF LAW**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Counsel for the defendant needs additional time to investigate, research, and file
14 pretrial motions.

15 2. The defendant is incarcerated and does not object to the continuance.

16 3. The parties agree to the continuance.

17 4. The additional time requested herein is not sought for purposes of delay, but
18 merely to allow counsel for defendant sufficient time within which to research and file pretrial
19 motions.

20 5. Additionally, denial of this request for continuance could result in a miscarriage
21 of justice.

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ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including April 25, 2022, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including May 9, 2022, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including May 16, 2022, to file any and all replies to dispositive motions.

DATED this 11th day of April 2022.



UNITED STATES DISTRICT JUDGE